



CITY OF UMATILLA

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May 23, 1996

John F. Larson, Project Manager
Pacific Energy Systems, Inc.
1600 SW Fourth Avenue, Suite 770
Portland, OR 97201

Dear Mr. Larson:

Reference is made to your request for position papers for presentation to the Energy Facility Siting Task Force. Although the following comments are not in the form of a position paper we appreciate incorporation of the City of Umatilla's comments into the task force report.

The City of Umatilla has experienced the process of siting a cogeneration facility and the comments are as follows:

The initial hearings conducted by the cogeneration plant were held in a nearby community and the public was of the opinion the hearings were related to the construction of the cogeneration facility not the related powerlines.

2. The first cogeneration applicant did not include notification of property owners to allow the property owners to participate in the planning commission meetings where the cogeneration company discussed the powerlines and the easement requirements.

3. With the onset of the second cogeneration plant the hearing location and notification process was greatly improved.

4. It is inappropriate and misleading to combine the hearing process for the application for the facility and the related powerlines as the impacts are completely unrelated and affect differing local communities.

5. The location of the facility is a known factor, however, the powerlines size and route are not determined until after the process is complete resulting in the dispensation of inadequate information to the public.

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6. The relocation of existing transmission lines as a direct result of the cogeneration plant is not taken into consideration in the application and the public loses the opportunity to address the impact of the additional poles, lines and easements.

7. The existing power line corridors should be reviewed to determine the least impact to the community and powerlines should be realigned when additional lines are required.

8. The Energy Facility Siting Council expects small cities to act as it's special advisors as what local land use criteria apply to the siting of energy facilities and transmission lines, however, small cities have generally not considered what criteria should apply, if any, when drawing up comprehensive plans and land use ordinances because they lack the expertise on staff and do not have the funds to hire the expertise.

9. ORS 469.441 provides language to address the need for a fee schedule to cover the costs incurred by the Energy Facility Siting Council, however, there is no language to address the reimbursement of expenses incurred by local government.

10. If the applicant were to apply through the City of Umatilla, the City's ordinance would require the applicant to reimburse the City for costs incurred in processing a conditional use application.

11. The Department of Energy staff has not proven to be a viable resource for local jurisdictions because of their concern with the applicant, the legislators and their department funding.

Sincerely,



Bonnie Parker
City Administrator

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